

violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a); (iv) trademark dilution in violation of Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c); and (v) unfair competition and trademark infringement in violation of the common law of the State of Texas.

2. Match.com is the owner of various trademarks under Match.com and related logos, including the standard character mark of Match.com, United States Patent and Trademark Office registration numbers 4582447 and 2088545 (“Match.com Marks” or “Marks”), and has used the Marks since 1995 in connection with its internet-based social networking, introduction, and dating services and products. Match.com has spent substantial time, effort, and money advertising and promoting its Marks throughout the United States and the world. The Match.com Marks, which are inherently distinctive, have consequently acquired significant goodwill and fame. The investigation described herein was initiated to protect consumers from technical support scams and the financial harm and security risks that they present.

3. As described more fully below, Defendants have engaged in a deceptive pattern of misrepresenting affiliation with Match.com and its Marks for the purpose of luring customers into paying for phony online technical support. For example, Defendants have, among other things:

- Used Match.com’s name and registered trademarks in connection with providing false online technical support services;
- Utilized the Match.com trademarks to confuse customers about their affiliation with Match.com and enhance Defendants’ credibility;
- Deceived customers into paying for unnecessary services based on their fabricated association with Match.com; and
- Improperly obtained access to the computers and Match.com accounts to steal identity and financial information.

4. Thus, in an attempt to profit from Match.com’s substantial investment in its Marks, Defendants offer to sell their phony technical support services through means that utilize spurious

marks that are either identical to or substantially indistinguishable from the Match.com Marks. Consumers naturally expect that technical support offered and sold using the Match.com name and Marks are, in fact, provided by Match.com, or at least licensed or sponsored by Match.com.

5. Match.com has investigated several complaints from Match.com users of purported technical support services provided by Defendants and confirmed that these services are not licensed or sponsored by Match.com, and that the Defendants are not providing any legitimate services. Instead, Defendants attempt to fraudulently charge consumers for unnecessary services while gaining access to computers and Match.com accounts beyond the scope of any consumer authorization. Consumers are therefore likely to be (and have been) confused and harmed by obtaining fraudulent services which they are persuaded they require, and have cancelled their subscriptions with Match.com.

6. As a result of Defendants' actions, Match.com is suffering damages to the Match.com Marks and its reputation. Not only are Match.com's customers being deflected from acquiring the genuine services that they may need, but after the harmful experiences with Defendants, customers have canceled their Match.com accounts. Therefore, Match.com now seeks temporary and permanent injunctive relief and damages resulting from Defendants' wrongdoing.

II. PARTIES

7. Plaintiff Match.com, LLC is a Delaware limited liability company with its principal place of business in Dallas, Texas. Match.com is an online dating service with websites serving 25 countries in more than eight languages. It provides internet-based social networking, introduction, and dating services and products, and it provides its own technical support for those services and products.

8. Defendant Aaron Deep, who does business as itgeeks247.com, is a resident of Newark, Delaware. Deep is the registrant of the domain itgeeks247.com. On information and belief, Deep operates a technical support business that fraudulently sells phony technical support services to Match.com users. Deep operates its business through multiple Internet websites, including but not limited to itgeeks247.com and amazingpccare.co.nr. Deep may be served with process at 11 Cheswold Boulevard, APT 1D, Newark, Delaware 19711, 10 Cheswold Boulevard APT 1D, Newark, Delaware 19713, or wherever he may be found.

9. Defendant Bhawani Singh, who does business as techlinesolutions.com, is a resident of San Jose, California. Singh is the registrant of the domain techlinesolutions.com. On information and belief, Singh operates a technical support business that fraudulently sells phony technical support services to Match.com users. Singh operates its business through multiple Internet websites, including but not limited to techlinesolutions.com. Singh may be served with process at 3593 Melnikoff Drive, San Jose, California 95121, P.O. Box 720732, San Jose, California 95172, 36 Silcreek Drive, San Jose, California 95116, or wherever he may be found.

10. Defendant Suresh Chandra, who does business as contacthelpdesk.info is a resident of Hicksville, New York. Chandra is the registrant of the domain contacthelpdesk.info. On information and belief, Chandra operates a technical support business that fraudulently sells phony technical support services to Match.com users. Chandra operates his business through multiple Internet websites, including but not limited to contacthelpdesk.info. Chandra may be served with process at 12 High Street, Hicksville, New York 11801, or wherever he may be found.

11. Defendant Marilyn Sterk, who does business as Alignteq.us, is a resident of Otley, Iowa. Sterk is the registrant of the domain Alignteq.us. On information and belief, Sterk operates a technical support business that fraudulently sells phony technical support services to Match.com

users. Sterk operates her business through multiple Internet websites, including but not limited to Alignteq.us. Sterk may be served with process at 117 180th Avenue, Otley, Iowa 50214, or wherever she may be found.

III. JURISDICTION AND VENUE

12. The Court has subject matter jurisdiction over Match.com's claims for trademark infringement, false association, false advertising, and cybersquatting pursuant to 15 U.S.C. § 1121 and § 1125 and 28 U.S.C. § 1331 and § 1338(a). The Court has jurisdiction of all state law claims under 28 U.S.C. § 1367. The Court also has supplemental jurisdiction under 28 U.S.C. §1367(a).

13. The Court has personal jurisdiction over Defendants because they (1) purposefully direct their unlawful activities at and have harmed a Texas limited liability company headquartered in Dallas, Texas; (2) have targeted consumers residing in Northern District of Texas; (3) have purposefully directed false and deceptive statements and conduct to Texas; and (4) have harmed Match.com and its Texas-based customers through these contacts with Texas.

14. Venue is proper because Defendants are subject to personal jurisdiction in the Northern District of Texas because Defendants have purposefully directed their unlawful activities at and have harmed a limited liability company located in Dallas, Texas, and because Defendants have targeted consumers with their unlawful activities in, inter alia, the Northern District of Texas.

IV. FACTUAL ALLEGATIONS

15. Pursuant to Federal Rule of Civil Procedure 65(b), Plaintiff's factual allegations, as set forth herein, are verified through the sworn declaration of Laurie Latshaw (attached as Exhibit 1).

A. Match.com's Intellectual Property.

16. Match.com develops, advertises, markets, and distributes online dating and networking products and services.

17. Match.com has duly and properly registered a number of trademarks and service marks in the United States Patent and Trademark Office on the Principal Register, including without limitation:

(a) “MATCH.COM,” Trademark Registration No. 85215707, standard character mark, for, *inter alia*, dating services; internet based social networking, introduction, and dating services; and

(b) “MATCH.COM,” Trademark Registration No. 2088545, typed drawing, for, *inter alia*, computer services, namely, providing information regarding, and in the nature of, on-line dating and introduction services.

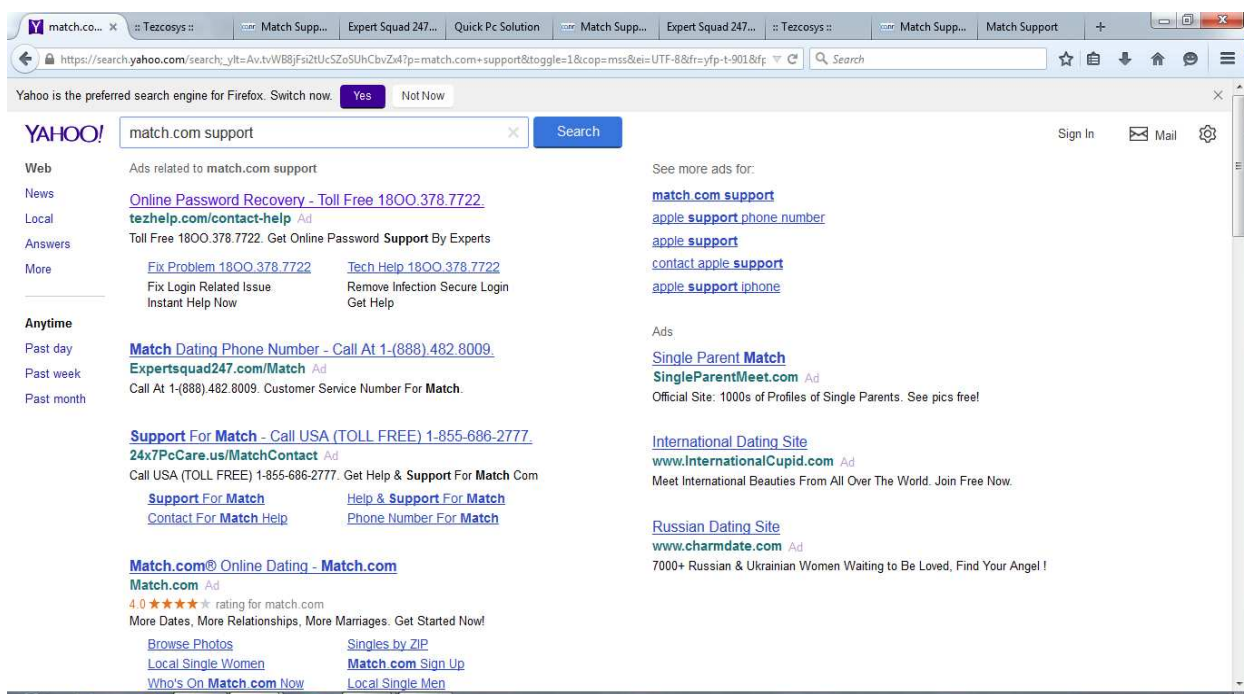
B. Online Technical Support Scams are Widespread.

18. Technical support scams are a pervasive problem affecting current online companies. Due to these problems, the Federal Trade Commission (FTC) has dedicated an area of its website to informing the public about these specific scams and has successfully brought complaints and obtained injunctive relief against technical support scammers. <http://www.consumer.ftc.gov/articles/0346-tech-support-scams>. For example, on November 10, 2014 the Federal Trade Commission—along with local law enforcement—raided the facilities of several technical support scammer companies; effectively closing down these and related businesses for engaging in deceptive business practices by running “a multi-million dollar computer repair scheme that exploits consumers’ fears about computer viruses, malware and other security threats.”¹ The TRO in this case included “an asset freeze” to allow for equitable relief for

¹ Plaintiffs’ Motion for an Ex Parte Temporary Restraining Order and Memorandum in Support Thereof, *F.T.C., et al v. Boost Software, Inc., et al*, No. 14-cv-81397; (S.D. Fla. filed Nov. 10, 2014).

those victimized by this scam. In addition, Microsoft and other companies have filed suit and sought injunctive relief against these technical service impostors.

19. These scammers have also targeted Match.com. For example, from April through July 2015 Match.com received over forty customer complaints related to technical support scams. These customers have all complained that various online companies, including the Defendants, hold themselves out as technical service providers for Match.com to induce consumers to contact them. Victims easily find these companies when running searches for Match.com customer support (and related information) through search engines, such as Google.com, Yahoo.com, and Bing.com, and the impostor websites often appear as the top-level advertisements on the search engine. The screenshot below depicts an example of the advertisements that appear immediately after searching for “Match.com support” on the Yahoo! search engine.



20. Match.com has reviewed the complaints brought by Match.com customers and attempted to gather all available information concerning the websites, individuals, and entities connected with each incident, including: (i) the date of the incident; (ii) the member’s contact and

account information; (iii) how the member found the technical service imposter, including what search terms and search engine they used; (iv) details concerning the member's interactions with the fraudulent technician; (v) whether the impostor identified as a Match.com representative or used Match.com intellectual property; (vi) any harms suffered by the member.

C. Defendant Deep's Website and Advertising Practices.

21. Defendant Deep has developed the website **itgeeks247.com** that perpetrates technical support scams on Match.com users. Deep registered the domain name itgeeks247.com on January 22, 2015, from email address lovekhurana789@gmail.com.

22. Deep has manipulated search optimization for itgeeks247.com so that when individuals search for Match.com technical support on a search engine (such as Google or Yahoo), one of the top results is http://itgeeks247.com/match_support.php. Attached as Exhibit 2 is a screenshot of this website. This website advertises itself as "Technical Support for Match" and provides the contact phone number 1-855-686-2777. The website also advertises that a user can "Get an instant match.com support from our certified technicians having years of experience in this domain" and displays the message:

Need Match Technical Support? You are at the right place to get wonder solutions for issues related to your Match products. We are here to help you with various Match errors you are getting. World-class Match online help is just one call away. Call Match support +1-855-686-2777 & talk to Match customer support to get access to our certified technicians.

Numerous pages on ItGeeks247.com display Match.com trademarks, including registration no. 85215707. Through this unauthorized use, Deep has created confusion in the marketplace and has diluted Match.com's trademarks because consumers think that Match.com is affiliated with Deep's website, company, and the number listed on the website and in search engine results and

advertisements. In addition, Match.com's brand and accompanying goodwill is harmed when users have poor experiences with Deep's fabricated site.

23. Several Match.com users have complained about misleading and deceptive conduct by Deep and those working for his website over the last few months. For example, on or around April 8, 2015, Match.com was first notified of Deep's fraudulent practices when a member reported an incident to a Match.com customer service representative. The member ("Member 1") performed a search online for Match.com support as she was looking for assistance in blocking a member on the Match.com website. Member 1 found and called the 1-855-686-2777 number associated with Deep's website for technical support. The technician who answered her call falsely represented to Member 1 that he was an employee of Match.com and attempted to charge \$150.00 to provide her assistance. Unfortunately, Member 1 fell victim to the scam and provided the fake technician with her email address and user information, as she thought the site offered legitimate Match.com support.

24. On or around May 10, 2015, a Match.com member ("Member 2") from Fort Worth, Texas, was attempting to join Match.com, performed an online search for Match.com, and was directed to the 1-855-686-2777 number. The technician who answered her call told Member 2 that her computer was being watched by someone and then attempted to sell Member 2 a spy deletion software. Member 2 then reported this incident to Match.com.

25. On or around June 14, 2015, a Match.com member ("Member 3") was attempting to find the Match.com customer service number on Google.com, and found the 1-855-686-2777 number listed on the website for technical support. The technician who answered her call falsely represented to Member 3 that he was an IT employee of Match.com and attempted to remotely access her computer. Unfortunately, Member 3 fell victim to the scam and provided the fake

technician with remote access to her computer, as she thought the site offered legitimate Match.com support. Member 3 reported this incident to Match.com.

26. On or around July 23, 2015, a Match.com member (“Member 4”) was attempting to find the Match.com customer service number, and found the 1-855-686-2777 number through an online search. Upon calling the number, Member 4 was told he would receive a lifetime membership to Match.com and was fraudulently charged \$250 by Deep’s technician. Member 4 also provided the technician with his Match.com login information, and his account was compromised. Member 4 reported this incident to Match.com when inquiring about his “lifetime subscription.”

27. Match.com has investigated the 1-855-686-2777 phone number and ItGeeks247.com website and confirmed that it is registered to Aaron Deep. Neither Deep nor ItGeeks247.com (and the phone number listed on the website) has any involvement or affiliation with Match.com.

D. Defendant Singh’s Website and Advertising Practices.

28. Defendant Singh has developed the website **techlinesolution.com** that perpetrates technical support scams on Match.com users. Defendant Singh registered the domain name techlinesolution.com on November 14, 2014 from email address bps0077@me.com.

29. Just as with itgeeks247.com, individuals have found the contact number 1-855-323-6154 and have likely been directed to <http://techlinesolution.com> when searching for Match.com technical support online. Attached as Exhibit 3 is a screenshot of this website. This website advertises itself as “Technical Support for Computers and Related Peripherals” and provides the contact phone number 1-855-323-6154.

30. On or around April 3, 2015, a Match.com member (“Member 5”) was searching online for help and technical support for her Match.com profile. Member 5 was directed to the 1-855-323-6154 contact number. Member 5 called the number and was connected with a “Match agent” who claimed they were adjusting her subscription price. Member 5 was then connected with another technician that remotely connected with her computer, and she was charged for the fraudulent services. Match.com investigated this report and traced the number Member 5 called to techlinesolution.com.

31. On or around June 1, 2015, a Match.com member (“Member 6”) was searching for Match.com technical support and found the 1-855-323-6154 contact number. Member 6 called the number and was directed to a techlinesolution.com technician, Roger, who then requested Member 6 to pay him for fixing a technical problem.

32. After Members 5 and 6 reported this incident, Match.com conducted an investigation and discovered that the techlinesolution.com website is registered to Bhawani Singh. Neither Singh nor Techlinesolution.com (and the phone number listed on the website) has any involvement or affiliation with Match.com.

33. Through these actions, Singh has created confusion in the marketplace because Members 5 and 6, and similarly situated customers erroneously believe that Singh’s website, company, and the number listed on the website and in search engine results and advertisements were affiliated with Match.com. Singh has thereby diluted Match.com’s trademarks because consumers think that Match.com is affiliated with Singh’s website. When those consumers inevitably have a negative experience, Match.com’s brand recognition and accompanying goodwill is harmed.

E. Defendant Chandra’s Website and Advertising Practices.

34. Defendant Chandra has developed the website **contacthelpdesk.info** that perpetrates technical support scams on Match.com users. Defendant Chandra registered the domain name www.contacthelpdesk.info from email address support@nsktechinc.com.

35. Just as with itgeeks247.com and techlinesolution.com, individuals have found the contact number 1-844-856-6825 and have likely been directed to <http://contacthelpdesk.info> when searching for Match.com technical support online. Attached as Exhibit 4 is a screenshot of this website. This website advertises itself as “one the leading service providers of Online Remote Contact Help Desk services which help Business entrepreneurs as well as individuals,” and provides the contact phone number 1-844-856-6825.

36. On or around May 7, 2015, a Match.com member (“Member 7”) was searching online for help and technical support for her Match.com profile. Member 7 was directed to the 1-844-856-6825 contact number and called it. Member 7 was connected with a “Match agent” who claimed Member 7 would have to pay \$150 to cancel her subscription. Member 7 provided them with her login information and the fraudulent technician then changed her name and profile and compromised her account.

37. Through these actions, Chandra has created confusion in the marketplace because Member 8 and similarly situated customers erroneously believe that Chandra’s website, company, and the number listed on the website and in search engine results and advertisements were affiliated with Match.com. Chandra has thereby diluted Match.com’s trademarks because consumers think that Match.com is affiliated with Chandra’s website. When those consumers inevitably have a negative experience, Match.com’s brand recognition and accompanying goodwill is harmed.

F. Defendant Sterk's Website and Advertising Practices.

38. Defendant Sterk has developed the website **alignteq.us** that perpetrates technical support scams on Match.com users. Defendant Sterk registered the domain name alignteq.us from email address sagar.berlin@gmail.com.

39. Just as with the preceding Defendants' websites, individuals have found the contact number 1-800-734-0842 and have likely been directed to <http://alignteq.us> when searching for Match.com technical support online. Attached as Exhibit 5 is a screenshot of this website. This website advertises itself as "Comprehensive support from certified technicians, skilled in providing computer support for repair, maintenance, troubleshooting," charges up to \$499.99 for a subscription "plan," and provides the contact phone number 1-800-734-0842.

40. On or around May 26, 2015, a Match.com member ("Member 8") was searching online for help and technical support for his Match.com profile, and found the 1-800-734-0842 contact number. Upon calling, Member 8 was connected with a "Match agent," who requested Member 8 to pay \$40 to cancel his membership. Fortunately, Member 8 did not provide the technician with his payment information and promptly reported the incident to Match.com.

41. On or around May 27, 2015, a Match.com member ("Member 9") was searching for Match.com technical support, and also found the 1-800-734-0842 contact number. After calling the number, Member 9 was directed to a technician, Jordan, who requested that Member 9 pay \$290 to fix his computer problem.

42. Through these actions, Sterk has created confusion in the marketplace because Members 8 and 9 and similarly situated customers erroneously believe that Sterk's website, company, and the number listed on the website and in search engine results and advertisements were affiliated with Match.com. Sterk has thereby diluted Match.com's trademarks because

consumers think that Match.com is affiliated with Sterk's website. When those consumers inevitably have a negative experience, Match.com's brand recognition and accompanying goodwill is harmed.

V. NECESSITY OF EX-PARTE RELIEF

43. Defendants have utilized improper means to use Match.com's Marks and names, and have flagrantly continued use it for their own financial benefit and to the detriment of Match.com and its users. Defendants can easily shut down their websites and open up others with a few clicks of a button on the Internet, and their fraudulent practices can be "relocated" to a new domain within a moments' notice. Therefore, Plaintiff seeks ex-parte relief so that Defendants will not be able to hide their illegal actions under the cloak of Internet anonymity upon notice of this lawsuit.

VI. CAUSES OF ACTION

A. Trademark Infringement – 15 U.S.C. § 1114 (Against Defendant Deep).

44. Match.com realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as though full set forth herein.

45. Deeps' activities constitute infringement of Match.com's federally registered trademarks and service marks with the registration numbers listed above.

46. Deeps' unauthorized use of the Match.com Marks to sell services unaffiliated and unassociated with Match.com is likely to cause confusion, mistake, and/or deception as the origin or source of the goods and services associated with the Match.com Marks, to cause initial interest confusion and also to mislead consumers into believing such goods and services originate from, are affiliated with, and/or are sponsored, authorized, approved, or sanctioned by Match.com.

47. Deep's unauthorized use of Match.com Marks on his website, as alleged above, constitutes infringement of those Marks.

48. Deep's unauthorized use of "Match.com" in his advertisements constitutes infringement of Match.com's federally registered trademark Match.com.

49. At a minimum, Deep acted with willful blindness to, or in reckless disregard of, the Match.com Marks.

50. As a result of Defendants' wrongful conduct, Match.com is entitled to recover its actual damages, Defendants' profits attributable to the infringement, and treble damages and attorney fees pursuant to 15 U.S.C. § 1117 (a) and (b).

B. False Designation of Origin and Unfair Competition – 15 U.S.C. § 1125 et seq. (Against All Defendants).

51. Match.com realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as though full set forth herein.

52. Match.com advertises, markets, distributes, and licenses its services under the Match.com Marks, and uses these trademarks and service marks to distinguish Match.com's services from the products or services of others in the same field or related fields.

53. Because of Match.com's long, continuous, and exclusive use of the Match.com marks, they have come to mean, and are understood by customers, end users and the public to signify products and services of Match.com.

54. Defendants' wrongful conduct includes the use of Match.com's Marks and name.

55. On information and belief, Defendants engaged in such wrongful conduct with the purpose of misleading or confusing customers and the public as to the origin, authenticity, or association of the goods and services advertised, marketed, installed, provided, offered, or distributed in connection with Match.com's Marks and name, and of trading on Match.com's

goodwill and business reputation. Defendants' conduct constitutes (a) false designation of origin, (b) false or misleading description, and (c) false association all in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

56. Defendants' wrongful conduct is likely to continue unless restrained and enjoined.

57. As a result of Defendants' wrongful conduct, Match.com is entitled to recover its actual damages, Defendants' profits, and treble damages and attorney fees pursuant to 15 U.S.C. § 1117.

C. False Advertising – 15 U.S.C § 1125 et seq. (Against All Defendants).

58. Match.com realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as though full set forth herein.

59. Defendants have a general sales practice in which they state that a customer's Match.com account has fraudulent issues and/or that they can provide subscription services to the customer.

60. Defendants make these statements in interstate commerce.

61. Defendants' statements are false or misleading statement of fact that disparage the quality and security of Match.com's services.

62. Defendants' statements either have deceived or have the capacity to deceive a substantial segment of potential customers.

63. Defendants' statements are material in that they are likely to influence the consumer's purchasing decision.

64. These statements disparage the quality of security of Match.com's website, products, and services, and Match.com has been and will be damaged by Defendants' wrongful conduct.

65. As a result of Defendants' wrongful conduct, Match.com is entitled to recover its actual damages, Defendants' profits, and treble damages and attorney fees pursuant to 15 U.S.C § 1117.

D. Federal Trademark Dilution – 15 U.S.C § 1125(c) (Against All Defendants).

66. Match.com realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as though full set forth herein.

67. Since 1995, Match.com has exclusively and continuously promoted and used the Match.com trademark. As one of the world's most well-known online dating service providers, the mark has become a famous and well-known symbol of Match.com—well before any of the Defendants began using the mark in association with their goods or services unaffiliated with Match.com through the Defendants' illegal use and infringement of the mark.

68. The actions of the Defendants including, but not limited to, their unauthorized use of the described famous mark in commerce to advertise, market, and sell fraudulent technical support services throughout the United States, including Texas, are likely to cause dilution of those marks by blurring and tarnishment in violation of 15 U.S.C. § 1125(c).

69. As a result of Defendants' wrongful conduct, Match.com is entitled to recover its actual damages, Defendants' profits, and treble damages and attorney fees pursuant to 15 U.S.C. § 1117.

E. Common Law Trademark Infringement and Unfair Competition (Against All Defendants).

70. Match.com realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as though full set forth herein.

71. As the exclusive owner and use of the trademarks described above, Match.com possesses valuable common law rights to the mark and the goodwill associated with it.

72. Defendants' unauthorized use of the Match.com Marks constitutes trademark infringement and unfair competition in violation of the common law of Texas.

73. Defendants' acts of trademark infringement and unfair competition have caused and will continue to cause Match.com monetary damage, loss, and injury in an amount not yet ascertained.

74. Defendants' acts of trademark infringement and unfair competition have been and will continue to be willful.

F. Application for Temporary Restraining Order, and Temporary and Permanent Injunction (Against All Defendants).

75. Match.com realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as though full set forth herein.

76. The relative equities of the parties are best served by permanently enjoining Defendants' actions in utilizing and profiting from Match.com's Marks and names.

77. Given Defendants' intentional and widespread misuse and trademark infringement of Match.com's Marks and fraudulent practices against Match.com users, it is likely that, unless enjoined, Defendants will continue to defraud consumers and infringe on Match.com's Marks. Match.com seeks the Court's protection to stop further misuse and fraudulent practices by Defendants.

78. Based on the foregoing, Match.com has shown a probable right to recovery. In addition, it has no adequate remedy at law. Unless enjoined, Match.com will suffer, and will continue to suffer, clear, immediate, and irreparable injury from Defendants' use of its Marks. Further, consumers will suffer, and will continue to suffer clear, immediate, and irreparable injury from Defendants' fraudulent practices.

79. The harm and loss will continue unless this Court restrains, and ultimately permanently enjoins, this conduct. Match.com is therefore entitled to temporary and permanent injunctive relief. As requested below, Match.com respectfully requests the Court to enjoin Defendants from continuing to use Match.com's Marks and providing phony services to consumers.

80. The temporary restraining order should be granted *ex parte* because Plaintiff will suffer irreparable injury if Defendants are provided notice of this application before the order is granted. Specifically, Defendants are likely to shut down their websites immediately when noticed and register new ones while continuing to profit to the detriment of Match.com and its users.

VII. PRAYER FOR RELIEF

WHEREFORE, Match.com respectfully asks this Court to enter judgment against Defendants, and grant the following relief:

- A. The entry of judgment in Match.com's favor on all claims.
- B. An *ex parte* temporary restraining order and temporary injunction, thereafter to be made permanent, restraining and enjoining Defendants, their directors, principals, officers, agents, representatives, employees, attorneys, subsidiaries, parents, affiliates, successors and assigns, and all others in active concert or participation with them, from:
 - (i) Any use of Match.com's registered trademarks, including the trademarks identified above, in connection with the marketing, promotion, advertising, or sale of any goods or service, including any website offering technical online services;

- (ii) Representing any affiliation, connection, or other relationship with Match.com;
- (iii) Offering or providing any services to any Match.com users relating to the users' Match.com accounts;
- (iv) Influencing online search engine results to advertise providing technical services for Match.com users;
- (v) Directly or indirectly engaging in advertising or promotions regarding the quality or security of Match.com website, products, and services;
- (vi) Making or inducing others to make any false, misleading, or deceptive statement of fact, or representation of fact in connection with the promotion, advertisement, or sale of goods or services related to Match.com website, products, and services;
- (vii) Using any false designation of origin or false or misleading description or false or misleading representation that can or is likely to lead the trade or public or individuals erroneously to believe that any services from Defendants has been offered, licensed, sponsored, approved, or authorized by or for Match.com, when such is not true in fact; and
- (viii) Assisting, aiding, or abetting any other person or business entity in engaging in or performing any of the activities listed above.

C. An award of damages including all general, special, actual, and statutory damages which Match.com has sustained, or will sustain, as a consequence of Defendants' unlawful act, and that such damages be enhanced, doubled, or trebled as provided for by 15 U.S.C § 1117(b).

- D. Pre- and post-judgment interest, as provided by law.
- E. A finding that this case is exceptional and an award to Match.com of its reasonable attorneys' fees and costs as provided for by 15 U.S.C § 1117.
- F. A permanent injunction upon final trial of this cause enjoining Defendants as requested herein.
- G. Such other relief that Match.com is entitled to under law, and any other and further relief as this Court of a jury may deem just and equitable.

Dated this 26th day of August, 2015.

Respectfully submitted,

/s/ Joseph R. Callister

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EXHIBIT 1

Temporary Restraining Order, and Request for Injunctive Relief (the “Complaint”), and the factual allegations contained therein are true and correct.

4. Over the last few months, Match.com has become aware that certain online technical service companies have been offering deceptive and harmful services to Match.com customers and representing a false affiliation with Match.com to obtain business. As described in the Complaint, these activities have harmed and continue to harm Match.com.

5. I have been responsible for overseeing Match.com’s review of these impostor technical service providers and have personal knowledge of Match.com’s investigation into the incidents relating to ItGeeks247.com, techlinesolution.com, contacthelpdesk.info, and alignteq.us. These websites were found by tracing the numbers called by Match.com members to phone numbers listed by these websites on the internet.

6. For example, on or about April 8, 2015, a Match.com user (defined in the Complaint as “Member 1”) reported an incident to Match.com involving the phone number 1-855-686-2777. Member 1 was looking for assistance in blocking a member on the Match.com website, performed a search online for Match.com support, and found 1-855-686-2777 as a phone number for technical support. Member 1 reported that after calling the phone number, a technician falsely represented to Member 1 that he was an employee of Match.com and attempted to charge \$150.00 to provide her assistance. Member 1 fell victim to the scam and provided the fake technician with her email address and user information. Match.com investigated this report and traced the number Member 1 called to ItGeeks247.com.

7. On or around May 10, 2015, a Match.com user (defined in the Complaint as “Member 2”) reported an incident to Match.com involving the phone number 1-855-686-2777. Member 2 reported that she was attempting to join Match.com, performed an online search for

Match.com, and was directed to the 1-855-686-2777 number. The technician who answered her call told Member 2 that her computer was being watched by someone and then attempted to sell Member 2 a spy deletion software.

8. On or around June 14, 2015, a Match.com user (defined in the Complaint as “Member 3”) reported to Match.com that she was attempting to find the Match.com customer service number on Google.com when she was directed to the 1-855-686-2777 number listed for technical support. She called the number, and the technician who answered her call falsely represented to Member 3 that he was an IT employee of Match.com and attempted to remotely access her computer. Unfortunately, Member 3 fell victim to the scam and provided the fake technician with remote access to her computer, as she thought the site offered legitimate Match.com support.

9. On or around July 23, 2015, a Match.com member (defined in the Complaint as “Member 4”) reported to Match.com that he was attempting to find the Match.com customer service number when he was directed to the 1-855-686-2777 number. Member 4 was told he would receive a lifetime membership and was fraudulently charged \$250 by Deep’s technician. Member 4 also provided the technician with his Match.com login information, and his account was compromised. Member 4 then reported this incident to Match.com when inquiring about his “lifetime subscription.”

10. After receiving the incident reports from Members 1-4, Match.com investigated the ItGeeks247.com website and discovered that it is registered to Aaron Deep. Neither Deep nor ItGeeks247.com has any involvement or affiliation with Match.com.

11. Attached as Exhibit 2 is a true and correct copy of screen shots of ItGeeks247.com taken from the internet, which falsely advertise that the company provides

technical support for Match.com.

12. On or about April 3, 2015, another Match.com member (defined in the Complaint as “Member 5”) reported a separate incident to Match.com involving the phone number 1-855-323-6154. Member 5 reported that she was searching online for help and technical support for her Match.com profile. Member 5 was directed to the 1-855-323-6154 contact number. Member 5 called the number and was connected with a “Match agent” who claimed they were affiliated with Match.com and would adjust her Match.com subscription price. As the call proceeded, another technician remotely connected with Member 5’s computer, and she was charged for the fraudulent services. Match.com investigated this report and traced the number Member 5 called to techlinesolution.com.

13. On or around June 1, 2015, a Match.com member (defined in the Complaint as “Member 6”) reported to Match.com that he was searching for Match.com technical support and was directed to the 1-855-323-6154 contact number. Member 6 was directed to a “Techline” technician, Roger, who then requested Member 6 to pay him for fixing a technical problem. Unfortunately, Member 6 paid the fraudulent technician.

14. After Members 5 and 6 reported this incident, Match.com conducted an investigation and discovered that the techlinesolution.com website is registered to Bhawani Singh. Neither Singh nor Techlinesolution.com has any involvement or affiliation with Match.com.

15. Attached as Exhibit 3 is a true and correct copy of screen shots Techlinesolution.com from the internet.

16. On or around May 7, 2015, a Match.com member (defined in the Complaint as “Member 7”) reported an incident involving the phone number 1-844-856-6825. Member 7 was searching online for help and technical support for her Match.com profile. Member 7 was

directed to the 1-844-856-6825 contact number and called it. Member 7 was then connected with a “Match agent” who claimed Member 7 would have to pay \$150 to cancel her subscription. Member 7 provided them with her login information and the fraudulent technician then changed her name and profile and compromised her account. Match.com investigated this report and traced the number Member 7 called to contacthelpdesk.info.

17. After Member 7 reported this incident, Match.com conducted an investigation and discovered that the contacthelpdesk.info website is registered to Suresh Chandra. Neither Chandra nor contacthelpdesk.info has any involvement or affiliation with Match.com.

18. Attached as Exhibit 4 is a true and correct copy of screen shots of contacthelpdesk.info taken from the internet.

19. On or around May 26, 2015, a Match.com member (defined in the Complaint as “Member 8”) reported an incident involving the phone number 1-800-734-0842. Member 8 was searching online for help and technical support for his Match.com profile. Member 8 was directed to the 1-800-734-0842 contact number. Member 8 called this number and was connected with a “Match agent,” who requested Member 8 to pay \$40 to cancel his membership. Fortunately, Member 8 did not provide the technician with his payment information and promptly reported the incident to Match.com.

20. On or around May 27, 2015, a Match.com member (“Member 9”) reported an incident involving the same 1-800-734-0842. Member 9 was searching for Match.com technical support and was directed to the 1-800-734-0842 contact number. Member 9 called the number and was directed to a technician, Jordan, who requested that Member 9 pay \$290 to fix his computer problem. Fortunately, Member 9 did not pay for these services.

21. Match.com investigated this report and traced the number Members 8 and 9 called to alignreq.us.


22. After Members 8 and 9 reported this incident, Match.com conducted an investigation and discovered that the alignreq.us website is registered to Marilyn Sterk. Neither

Sterk nor alignreq.us has any involvement or affiliation with Match.com.

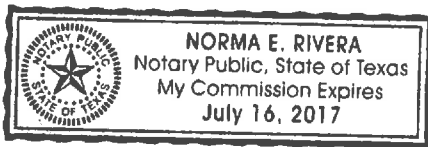
23. Attached as Exhibit 5 is a true and correct copy of screen shots of alignreq.us taken from the internet.

24. By falsely representing an affiliation with Match.com, Defendants Deep, Singh, Chandra, and Sterk, and their respective websites, have created confusion in the marketplace and harmed Match.com's reputation and goodwill.

This concludes my affidavit testimony.


Laurie Latshaw

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority on this 19th day of August 2015, to certify which witness my hand and official seal.





Notary Public, State of TEXAS

EXHIBIT 2

WestlawNext Legal Researc... x WestlawNext x WestlawNext x it geeks 24 7 match - Goog... x Match Support | IT Geeks247 x +

itgeeks247.com/match_support.php itgeeks 24 7 match

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Technical Support For Match

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We Provide Support all problems for match.com.

If you a have any issue in email, just call on the support no to get the best and affordable support.

SMART & INSTANT SUPPORT FOR MATCH

Match.com Support

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now to assist you
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Support For Match Problems Toll Free 1 855 686 2777


Get an instant match.com support from our certified technicians having years of experience in this domain. They provide help for email by doing proper research. Our team of certified technicians gets into the source of problem and fixes every related issue from the root node.


We Provide Support all problems for match.com.

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SMART & INSTANT SUPPORT FOR MATCH

 Need Match Technical Support? You are at the right place to get wonder solutions for issues related to your Match products. We are here to help you with various Match errors you are getting. World-class Match online help is just one call away. Call Match support +1-855-686-2777 & talk to Match customer support to get access to our certified technicians.

 To receive Match help and support, we have researched and confirmed the Match.com contact information that is available.

 The Match help and contact details are now including the help phone number for Match customer service. Match.com is reachable by online support and the Match phone number is provided for direct calls.

OUR SERVICES INCLUDES SUPPORT FEATURE

1) Unable to Sign In.



Match.com
Support

**1 855 686
2777**
CALL US NOW

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Adding/Removing a Favorite](#)[Favorites - Hidden Profiles](#)

- 2) Changing Username, Password, Email Address, etc.
- 3) How do I stop or start receiving emails from Match.com?
- 4) Removing Profiles From Search Results
- 5) Subscription Was Automatically Renewed
- 6) Profile Unavailable
- 7) Price and Subscription Package Options
- 8) Controlling Who Sees Your Profile and Photos
- 9) Blocking and Unblocking
- 10) Changing a Primary Photo
- 11) Username And Password No Longer Work
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EXHIBIT 3

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Normal tasks that you perform on your PC lead to wear and tear, performance goes down with time and adding or removing a software may mess the efficiency of your PC thus denying you the performance that you deserve. Our technicians can assist you in making your PC work like new, boot and shutdown faster. You will get a never before performance from your PC post we optimize it. Just try our services today!

Virus & Spyware



Removal

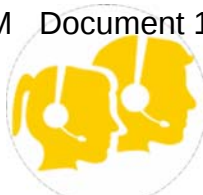
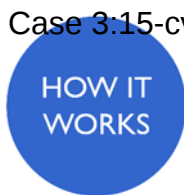
Virus exploits security loopholes to access private information on your computers and corrupt the software and there are millions of them on the web. Speak to our certified technicians who will assist you in installing the security on your PC to safeguard it from virus and spywares, thus keeping your personal and banking information safe.

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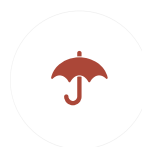
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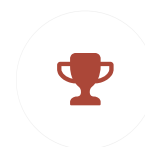
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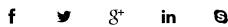
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• Mark Adraison
customer

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